

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

Chapter 11

In re	:	
DELPHI CORPORATION, et al.	:	Case No. 05-44481 (RDD)
Debtor	:	Jointly Administered

OBJECTION OF CREDITOR F&G TOOL & DIE CO. INC. TO NOTICE OF CURE
AMOUNT WITH RESPECT TO EXECUTORY CONTRACTS TO BE ASSUMED
AND ASSIGNED

Now comes Creditor F&G Tool & Die Co. Inc. (“F&G Tool”) and hereby objects to the cure amount of \$65,043.87 (and \$0.00 on certain other contracts) listed in the Notice of Cure Amount With Respect to Executory Contract to be Assumed or Assumed and Assigned Under Plan of Reorganization dated December 10, 2007 for the following reasons:

1. Debtors’ Notice of Cure relating to executory contracts to be assumed with respect to F&G Tool as referenced above lists a cure amount of \$65,043.87 for Contract No. D055004181 and a cure amount of \$0.00 with respect to Contract No’s D0550055872 and D0550080025 in Exhibit 1 attached to the Notice.
2. The actual total of amounts owed to F&G Tool as set forth in Exhibit “A”, attached hereto and incorporated herein, is \$145,739.73. This is the appropriate cure amount with respect to the assumption of executory contracts between Debtors and F&G Tool.
3. Accordingly, F&G Tool objects to the proposed cure amounts described above and respectfully requests that the Court order that the correct cure amount is \$145,739.73.

Respectfully submitted,

/s/Paul H. Spaeth

Paul H. Spaeth (Ohio Regist. No. 0010524)
(Motion for Admission to Practice Pro Hac
Vice Pending)

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CERTIFICATE OF SERVICE

Undersigned counsel hereby certifies that a true and accurate copy of the foregoing Objection of Creditor F&G Tool & Die Co. Inc. To Notice of Cure Amount With Respect to Executory Contracts to be Assumed and Assigned was served electronically through the Court's electronic transmission facilities upon those parties receiving such service in this case and by ordinary United States mail service this 9th day of January, 2008 upon the following:

Honorable Robert D. Drain
United States Bankruptcy Judge
United States Bankruptcy Court
for the Southern District of New York
One Bowling Green, Room 610
New York, New York 10004

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/s/Paul H. Spaeth
Paul H. Spaeth